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CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

James L. Martin, plaintiff

: Civil Action No. 85-00053-JJF

v.

: Jury Trial Demanded

Delaware Law School of Widener University, Inc., Commonwealth of
Pennsylvania Department of Transportation, Bureau of Traffic Safety
Operations, et. al., defendants

Plaintiff's Rule 60(b)(4)(5), or (6) Motion to Reopen, with proposed Order

I, James L. Martin, move to reopen pursuant to Rule this 24th day of
July 2007, for the following reasons:

1. Rule 60(b) provides several provisions to warrant reopening:

"On motion and upon such terms as are just, the court may relieve a party or
a party's legal representative from a final judgment, order, or proceeding for
the following reasons: . . . (4) the judgment is void; (5) . . . it is no longer
equitable that the judgment [from Judge Farnan] should have prospective
application; or (6) any other reason justifying relief from the operation of the
judgment."

2. The grounds for reopening this case are not restricted or limited to
the one-year period that applies to motions based on subsections (1), (2), or (3).

3. On 5-24-07, I asked for the renewal of my driver's license at the
Delaware Division of Motor Vehicles.

4. Despite my good driving record ever since I was licensed, in May
1969, the clerk refused to renew my license, based on the documented

misconduct of the parties to this case, and not corrected despite the passage of more than twenty-five (25) years. The sixty-day "temporary driver license," has now expired.

5. According to my car insurance representative, my policy may lapse if the abuses recited in the underlying action are left unremedied.

Additions reasons are in the accompanying Memorandum.

WHEREFORE, I request that this motion to reopen be granted.

BY: James L. Martin
James L. Martin, attorney; 805 W. 21st St.; Wilmington, DE 19802-3818
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ORDER

Upon consideration of the Plaintiff's Rule 60(b)(4)(5), or (6) Motion to
Reopen, and supporting Memo, and of any opposition(s),

IT IS ORDERED that the Motion is granted. The Clerk shall schedule
this case for a pretrial conference.

UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of Plaintiff's Motion
to Reopen with proposed Order upon opposing counsel of record for the
defendants at the following addresses:

Somers Price, Jr., Esq.; POTTER, ANDERSON & CORROON; P. O. Box
951; Wilmington, DE 19899;

A. Taylor Williams, Esq.; Adm. Office of the PA Courts; Suite 1414;
1515 Market St.; Phila., PA 19102;

Gwendolyn T. Mosley, DAG; Office of the AG; Litigation Section; 15th
Floor; Strawberry Square; Harrisburg, PA 17120;

Robert B. Young, Esq.; YOUNG & MCNELIS; P. O. Box 1191; 300 S. State
St.; Dover, DE 19903;

Stuart B. Young, Esq.; 1705 N. Bancroft Pky; Wilmington, DE 19806; and
on

F. Alton Tybout, Esq.; TYBOUT, REDFEARN & PELL; 750 S. Madison
St., Suite 400; Wilmington, DE 19899-2092.

by first-class, postage prepaid mail this 24th day of July 2007.

BY: James L. Martin
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